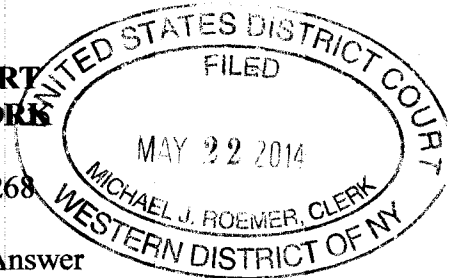


**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**



DONNA MULVIHILL,
Plaintiff,
v.
ONTARIO COUNTY
Defendant

(No. 13-CV-6268
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(Response to Answer
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Plaintiff Donna Mulvihill responds to Ontario County Defense Attorney Thorness, who answered the complaint that was filed on May 2013 and amended on August 3, 2013.

1. The Plaintiff, Donna Mulvihill's Fourth Amendment rights were violated when Ontario County Judge Doran signed an unconstitutional order and Ontario County CPS Supervisor Rhonda Peterson and Ontario County CPS agent Russ Standish and an armed-deputy from Ontario County Sheriff Department entered her home on March 28, 2013 and searched every room in her private home and seized her innocent children for no probable cause.

2. The FACTS in paragraph 2 of Ms. Mulvihill's complaint are true and Ms. Mulvihill requests an opportunity to DEPOSE Standish as required in FRCP 30 and a right to trial by jury to decide facts as the Seventh Amendment demands.

Standish stated and Ontario County defense attorneys do not dispute the reason he came to the Mulvihill home on February 19, 2013 was because the Ontario County CPS received a call that JM and IM were victims of educational neglect for the 2011/2012 year. Mr. Mulvihill stated to Standish that his family had just arrived home (2 days ago) on February 17, 2013 from Lynchburg, Virginia where Donna Mulvihill was a law student at Liberty University and their children attended Liberty Christian Academy. Mr. Mulvihill stated to Standish he would verify these facts and did within one day.

The question every person will ask when they hear these clear facts of the case is then WHY would the investigation not be closed when the education neglect complaint was proven false and the false reporter then be investigated? WHY would there be an aggressive fight by Ontario County to search the Mulvihill private home and seize their children for an interrogation about private details unrelated to education or even parenting? It is malicious organized uniting to violate Ms. Mulvihill's Fourth Amendment rights that she is promised in America and has the "right to be SECURE in her person, house, papers, and effects against unreasonable searches and seizures."

3. The FACTS in paragraph 3 of Ms. Mulvihill's complaint are true and clearly stated. Let discovery gather depositions and a jury hear the witnesses under oath state the facts of the case as the Constitution so requires.

4. The FACTS in paragraph 4 of Ms. Mulvihill's complaint are true and Standish's conversation on speaker phone was heard by both Plaintiff Donna Mulvihill and her husband Robert. "Good you got the letter" was his statement and "the protocol" is a "full investigation" which means a "full search of private home and interrogation of children of inquiry about various issues such as discipline methods, diet, mental problems of parents, bedtimes, family activities, and travels of parents." Standish accomplished his unconstitutional mission on March 28, 2013 when Judge Craig Doran authorized him to violate Ms. Mulvihill's rights and information gather for no probable cause.

5. Documentation does speak for itself and Ontario County CPS supervisor, agent, attorneys, and all 18 on the Board of Commissioners knew that there was an aggressive investigation for no reasonable cause and it was clearly an unconstitutional violation.

Liberty Counsel also mentioned in the letter that Plaintiff Donna Mulvihill was threatened by "homosexual activists" on Senator Greg Ball's wall in July 2011 after Senator Ball voted NO and she had been active in the lobbying to oppose redefining marriage to include the unholy union of same-sex couples. The threat was "Donna Mulvihill expect a visit from CPS." This was not the only threat. Other homosexuals made disturbing threats of physical attack. This clearly indentified the reason behind a FALSE complaint and no one in Ontario County stopped this obvious attack on a good family by CPS. The fact Ontario County is aggressively blocking the identity of a FALSE reporter, it is highly logical this person is from this original threat and being protected. It is very concerning that a good family with a perfect record receives an obvious false report that is clearly bogus and still CPS goes on an aggressive pursuit to torment this good family and violate their rights despite the great warnings from Liberty Counsel; a law firm that specializes in the political subject of constitutional law.

6. The facts in paragraph 5 of Ms. Mulvihill's complaint are true. Standish stated "things are going to get ugly and now we want access to that 3-year-old girl" in retaliation to "resisting" and getting Liberty Counsel involved. How disturbing is that to a good mother who adores her 3-year old daughter more that anything? Ms. Mulvihill has never experienced a more frightening threat by a tax-salaried officer of the law for NO reasonable cause. Did someone tell Standish to say such evil or to use such threats? No one will know by the courts that have dismissed this man and gave him carte blanche to go after other families who may be his next victim.

The day before Judge Doran signed the unconstitutional order the plaintiff went to Ontario County Sheriff begging for restraining order against CPS Agent Standish.

The Plaintiff stated to Officer Cooley about these threats. Then she went over to Family Court and told the secretaries of Judge Doran about the threats. EVERYONE ignored her pleas and now Thorness lies about the threats. God help us!

7. The FACTS in paragraph 7 in Ms. Mulvihill's complaint are true. Liberty Counsel letter to Attorney Holly Adams confirms the moronic twist of the 14th Amendment she stated as her reason for violating Ms. Mulvihill's Fourth Amendment rights. The New York Social Service Law 424 was discussed and Liberty Counsel Attorney Richard Mast stated that there is no protocol in this law and therefore there must be reasonable cause to enter the Mulvihill home. There was never any discussion by Adams about other concerns about the Mulvihills as seen in the Access Order Request she created with clear identifiable blatant lies. The Order is now sealed from view so no one can see the clear malicious intent to violate the Mulvihill's Fourth Amendment rights. Total injustice.

8. The FACTS in paragraph 8 in Ms. Mulvihill's complaint are true and Ontario County is forced to admit it "speaks for itself." Of course Ontario County denies everything else that is not in writing. Let the jury decide the facts of the case under oath.

9. The facts in paragraph 9 in Ms. Mulvihill's complaint are true. Why was Russ Standish back out on the Mulvihill's 3-acre fenced in property on Honeoye Lake when the educational neglect complaint was proven baseless? Why did he state his "boss" Matt Grant wanted access? This is of great interest to many of her friends in Ontario County, especially doctors and nurses from F.F. Thompson who have called CPS for REAL cases in Ontario County and they were told agents were too busy to help with overloaded cases. Overloaded case of driving back and forth 30+ miles to the Mulvihill house for no reasonable cause. CPS of Ontario County revealed their true purpose by this case.

10. Judge Doran did receive a letter titled *DSS v. Mulvihill* and the facts of the matter and the Mulvihills great perfect record and relationship with Judge Frederick Reed. Either he read the letter and ignored the blatant lies in the Request for Access Order or he did not do his due diligence and never read the letter and signed an order out of blatant negligence. I hope now he has chastised Ontario County Attorney Holly Adams behind the scene who destroyed his credibility as a family court judge and used great deception to violate the Mulvihill's Fourth Amendment.

11. The county lacks sufficient information? Give me a break.

12. Unconstitutional Order does speak for itself and a great injustice in America!

13. The FACTS in paragraph 13 in Ms. Mulvihill's complaint is true. Put Officer Hicks on the stand under oath and I am sure this Christian man will not lie when forced to share the facts. The issue of educational neglect was still unresolved according to Thorsness. Tell that to the jurors and watch their reaction. What a joke!

14. Ms. Mulvihill did have a camera video taping Standish and Peterson smirking as they entered her home for no reasonable cause. It is her house and she can do what she wants to do and video and say whatever she wants to say. The videotape is excellent proof of the great violation of the agents of Ontario County and viewed by thousands of people. When Ms. Mulvihill put the video on Facebook account the comments were "WTF" and "I am boiling." In the real world Standish and Peterson are enemies of America's freedoms and rights. I forever have that video and will use it during campaign when I feel appropriate as I am running for governor on the Constitution Party. How perfect is that.

When people witness Standish walking through Plaintiff's bedroom asking about her harp and if she plays they question if the Plaintiff's husband should have used force to block them from such a violating act. Will there ever be justice from the courts?

It is pathetic that the dirty feet of Ontario County agents walked all over Ms. Mulvihill's white carpet in her bedroom. How sad to be such unlawful violators and have nothing better to do with the tax dollars of New Yorkers. I will surely use this to bring attention to the great waste of tax dollars by a jumbo-sized government that has lost its purpose as outlined in the U.S. Constitution. This is truly unbelievable and a great challenge for Americans who take great pride in living in the "Land of the Free."

I wonder how Thorsness or Schneiderman or a judge would feel if this storyline happened to them and their family. Are they exempt from this type of intrusive search and interrogation of their children for no probable cause? They do not go by the same rules they create when violating the paramount law of the United States.

Let the jury watch the video of these intruders who entered a private world to harass a family. Let the jury hear the comments. These intruders violated everything Ms. Mulvihill holds sacred. Great damages should be awarded and encouraged by a judge who knows the true story and the great violation created by Ontario County agents.

The Mulvihill children know how evil the violation was and pastors from Faith Bible in Honeoye, Bethel Christian Fellowship in Rochester, and the First Bible Baptist in Greece have prayed for the Mulvihill children. Slowly the Mulvihill children are again trusting people in authority and know such evil will never again happen to them in their private home. They have had counsel and prayer and all wait for closure and justice.

Peterson and Standish interrogated each child individually and forever that nightmare will be in the children's memory. Each child was inquired in depth about their parent's relationship and if the parents fight and terrifying questions about violence in the home. The Mulvihill children were deeply upset over such a disturbing interrogation. The Mulvihills have a great home and never has anyone had concerns that the parents who have been faithfully married 24 years ever had domestic violence. Standish and Peterson ripped apart the normal world of children who had to answer disturbing questions of parents they adore while an armed police officer blocked their parents.

The Mulvihill children were laughing during the interrogation? No doubt Thorsness is a heartless person for making such a comment. The same woman who tried to ruin the Mulvihill Christmas with her affidavits she saved for that week. Ontario County hired a real winner who takes vengeance on moral families. Her efforts are in vain and will not prosper. That she will find out.

Not 3 occasions- 1 occasion- Ms. Mulvihill went into the living room when Ms. Mulvihill's 9-year-old son was being interrogated by Standish about the location of his 21-year-old sister. Standish aggressively tried to get an address and Ms. Mulvihill barged in demanding the reason for such probing of personal information of her innocent daughter. Officer Hicks screamed he was going to restrain Ms. Mulvihill for coming in. Coming in to protect her daughter's information. Ms. Mulvihill's son did not laugh but looked sick. It is a great injustice to block this from a jury who would be unbiased and not find this funny! Ms. Mulvihill went to Ontario County Sheriffs to report this inquiry of her daughter's information. The Sheriffs in Ontario County could not help.

Rochester police recommended alarm and roommate for the Mulvihill daughter's protection that now is a great concern to Mr. and Ms. Mulvihill.

For the record Ms. Mulvihill's daughter now rents a room in her home to a young man who is an Army sniper who knows how to defend property and people who reside in their home. A jury should hear this story in full and Standish should be required to answer who wanted to know where Ms. Mulvihill's daughter lives? Tons of friends and family also want this information of why a CPS agent wanted the address.

Isn't it interesting at the end of such great violation of searching the Mulvihill home and interrogating the children then Standish requested the ATTENDANCE record. He already had the information about the children being at Liberty but now wanted the attendance record. Why? To come back a week later to attempt to arrest the Mulvihills for a residency issue. It is o.k. in the state of New York to use children to gather information to use against parents in another outlandish bogus case. This will surely make a great book after Ms. Mulvihill runs for governor.

Standish also interrogated the Mulvihill's 6-year-old boy about spankings and when JM said he was spanked- Standish stated the JM should tell his parents to now just give him a 6-minute time out and not to spank him anymore. Some crusty and creepy man tells a boy to challenge his parents. That made Ms. Mulvihill's father want to come up and confront this evil Standish for ripping apart his daughter's rights. And does Standish think he has a right to challenge Biblical principles and recommend drugging kids or some other way to discipline. These people deserve the wrath they will get from their violations.

Officer Hicks was so upset about Standish challenging the Mulvihill's discipline method. He told Standish he was out of line and that Mulvihills have a right to spank.

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I expect great damages for this nightmare and the federal judge should make sure that happens if he really cares about justice in America. Someone must take control of this case and make it right! God help us!

Then in front of a police officer Hicks and the Mulvihills, Standish inquires if now the Mulvihills will move when he is leaving. The henchmen sent to scare a family away.

Back in the days of Governor George Pataki and a good attorney general and judges who are for justice this man would have a great price to pay. Not in 2014 when good families are "targets" as Russ Standish stated in conversation when Ms. Mulvihill claimed she would homeschool. Targets? Have this man under oath stating he did not say all this to scare the Mulvihills. And what was this man's reason to scare a great family out of town? The Mulvihills never met Standish in their twelve years in Ontario County. Never heard his name. What caused this great energy to scare them out of town? The Mulvihills will never leave and pray Standish and his people are forced to move to a place away from Ontario. That is their prayer unless Standish changes his evil ways. Many are praying that in Ontario, Livingston, and Monroe County. Justice will come!

15. This was on video and thousands have seen the great violation. One day it will haunt all those who were too scared to let justice come to pass. Pensions and spiffs should never be traded for justice. What a mockery this is!

16. Standish made this statement and a hypocrite who stated in the Pennysaver in Ontario County he fights for our freedoms as an Army Reservist when in truth he is ripping them apart in America! Shame on him!

17. The Mulvihills had an excellent rating after information was gathered and the county now planned to arrest them for residency with the children's attendance record.

If Ms. Mulvihill was an illegal immigrant and never paid a dime of property tax this would never happen. According to Albany, no one ever heard of a residency issue of a family who owned two homes in Ontario County and never owned a home in another state. Something is fishy!

18. This letter to Judge Doran was the reason the other investigation was called off because he got revelation of what was going on. Ask Detective Cordon about that and Marie from DSS. The Mulvihills have a perfect record and still do. Good try. It did not work though and as the Rochester detective stated, "Donna, the fact someone with this power had such great effort to destroy your family you should thank God how great you all fared." Do not underestimate your opponent.

19. The letter I have for proof, but I am sure will never be submitted as the courts have united with defense and no justice for Mulvihills via the courts.

20. Mr. Grant shared for one hour on the phone how his group can do it another 50 times to the Mulvihills and it came from Albany. Try again Matt Grant and see what happens when you try to get a judge to sign an unconstitutional order. I am sure you are done with your harassing and now it is time to take care of the families you ignore! And stop telling CPS agents to force parents to sign unenforceable contracts they will not spank their children in return for an unfounded report. They now know that this is unenforceable contract that is void because of duress. The story here in Ontario County is that Grant had an abusive mother and now takes his revenge out on good mothers. He may need a new job and definitely therapy. Christian families are the bedrock of society and you can learn much from their wise parenting. Get back behind your boundaries! I pray Ontario County CPS to get on track for the sake of the children I love and care about.

21. Grant said it was PROTOCOL and they can do it 50 more times with a false report.

Who made the false report? I thought if you purposely made a false report it was a felony in the State of New York. Is that false reporter being investigated?

22. In October 2013, the humane society took away all 14 horses the home of Ms.

Mulvihill's horse instructor even though there was sustenance and caretakers. A few horses were sick from parasites. Now they are returning horses after forcing her to plead guilty for one misdemeanor count of neglect or face 20+ misdemeanor charges and two felonies. She is charged \$31,000 for care of horses Ontario County seized. We are desperately in need of a governor who can bring law and order back to the county and protect good families and truly fight corruption in the state of New York.

23. DSS in Ontario is corrupt and other counties do not operate as they do. Some counties truly care about children and would terminate anyone who threatened children of parents.

24. Matt Grant stated these facts.

25. Severe distress that has now become a great fearless power to run for governor and protect those unable to self defend. No fear of anyone but the God who gave Ms.

Mulvihill breath and protected her family she adores.

26. Ms. Mulvihill has survived a great attack on her family and is standing tall.

27. Sad man is Russ Standish and everyone who empowered him to violate the Mulvihills are just as guilty. The sin of omission.

28. Standish is a man who should be under watch and am sure will cross the path of his match one day. We pray for this fool to never hurt another family.

29. What about that phone call to Principle Mark Leckie and the school? We will never find out who orchestrated that. How un-American to follow a family and go to Virginia as Detective Cordon stated. Get a life!

30. Four-year-old girl rest in peace and may never Ontario County ever be involved in placing children in violent, dangerous homes. God bless her parents.

31. I am stronger than ever thank you for the great challenge that has changed me forever and made me fearless. Romans 8:28.

32. Holly Adams should be disbarred. If I am governor, that will be done. If Rob Astorino/John Cahill replaces the Cuomo/Schneiderman team I am sure this corruption will be challenged. God help us!

33. What a day that was for the book I will write. The day I had to hide my children from aggressive officers. I am sure that will never happen again with the great spotlight. The Mulvihills are the safest family in Ontario County because of Ms. Mulvihill's exhaustive work to reveal their story. Now the Mulvihills can live at peace. Not the way to create a stable community. I am sure we will watch justice come in Ontario some other way.

History proves that fact! What a great book I will be able to write!

34. Good our parents are rejoicing I am running for governor and have a great platform to share this story and a greater spotlight on our family to protect us from future attack by the hateful intolerants of family and freedom.

35. Judge Doran should apologize and go back to doing good as I am sure his wife would hope for. He owes this due diligence to the county under his jurisdiction.

36. Matt Grant needs therapy and should not be a director of CPS.

37. Thorness stated Ms. Mulvihill was high strung. Greatly distressed beyond measure is a more accurate description. Thorness should not be the authority on how a mother would react to such great violation. She has no idea of this feeling. A world-renowned psychologist, Dr. Judith Reisman requested to be the expert witness at Ms. Mulvihill's trial. Ms. Mulvihill should have her day in court and trial by a jury of her peers.

38. I am very sorry that my children went through such a bizarre event because of hateful people. I pray for our enemies and try to forgive them for their trespasses.

39. Ms. Peterson should care about the children she tells the hospital she is too busy to investigate. She is a hypocrite.

40. Of course this is denied as it is united in deception we stand in Ontario County. That is a great shame to a county where many good families pay taxes and reside.

41. Ms. Mulvihill is a resident and can legitimately run for governor.

42. Ontario County needs good employees to replace the ones who are jealous of good families. Poor officer who screamed like a maniac and looked filled with shame. I may get his vote for governor as he now realizes what was going on.

43. I will go on Bill O'Reilley in August for campaign. Still debating if I am going to waste air time with this story or just save it for that best seller book. A book Ms.

Mulvihill's friends throughout the world await to read. Romans 8:28.

49. Josiah is now blessed and we do all of our activities in Victor/Pittsford where good families thrive and the creeps do not fit in and are not welcomed.

45. No charge of harassment for Russ Standish. I will keep a watch to see how justice plays out. In my 47 years of life I have always seen justice eventually come. I am sure it will come soon and pray for God's grace and mercy for our enemies.

The gossip in Canandaigua is all about how corrupt the courthouse is. Ontario County should not be proud to get off violators and protect the bad guys and gals with tax dollars.

46. Ms. Mulvihill hopes the person who wanted to ruin her life repents.

47. The Mulvihills will be living in Monroe County but will never sell their Honeoye Lake home in Ontario. This is their land/home and no one will push them off their property they have shared for ten years with friends/family who visit the Finger Lakes.

48. It is a very similar story; however Nassau County is not trying to destroy the victim but settled. We will get rewarded one day. That is a promise from God.

49. Ms. Mulvihill homeschooled this year since Standish threatened he had access to the children. Next year they will be at a private school in Monroe County and the Mulvihills have no concerns because Standish is unable to get in. They assume he will avoid them now after he has been revealed and this great spotlight.

50. Michael Reinhardt lied when he stated, "Ontario County pays when they make a mistake." Another deceptive attorney who has no concern of truth.

51. Mr. Reinhardt is another typical Ontario County corrupt officer who has no concern for justice and will destroy people for the sake of job security.

52. Mr. Reinhardt is not a good man.

53. Homosexuals are revengeful to good families and I hope to never cross their path again. I have no trust in this hostile/intolerant group.

54. I will forever fight for the unborn. Human life is sacred! I continue to pray Planned Parenthood is defunded and becomes extinct.

55. Governor Cuomo needs God and I pray he turns from his wicked ways and becomes a good man and leader. *Under the Regime of Cuomo* would make a great title for my book.

56. Defamation turns on the person who hopes to destroy a good family. Truth always prevails and there will be a day when justice returns to New York.

57. Attorney Holly Adams should be disbarred.

58. This Easter 2014 we had 60+ people celebrating at our Honeoye home. Joy has returned. God is faithful! Blessed is our Lord who lifted us up!

Ms. Mulvihill awaits her conference meeting.

This year has brought great revelation of the sad condition of the State of New York.

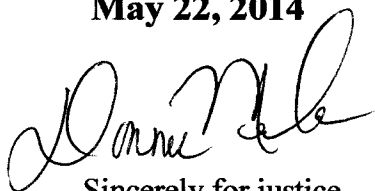
The Mulvihills pray this ship can be turned around and Ms. Mulvihill submits to any plan God has for His good purposes on earth.

God help us in New York.

Deliver us from evil.

Keep us free and blessed!

May 22, 2014



Sincerely for justice,

Donna Mulvihill

Pro Se Representative

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

DONNA MULVIHILL

Plaintiff

v.

ONTARIO COUNTY

Defendant

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13-CV-6268

I hereby certify that on May 22, 2014, I hand-delivered the following document with the U.S. District Court.

A Response to Answer

I had my husband, Robert Mulvihill, hand-deliver this document to the fourth floor of the Ontario County Court House to the Ontario County Attorneys.

Ontario County Attorneys
27 North Main Street Fourth Floor
Canandaigua, New York 14424



Pro Se Plaintiff Donna Mulvihill
5509 West Lake Road
Honeoye, NY 14471

Dear Judge Larimer,

I would appreciate details about the GAG order that was signed where I will have consequences of possible felony if I discuss my case to Ontario County Employers. Quite a few situations have brought confusion and a radio show - Kevin Dean wanting discussion of case.

And I did not know if I could speak publicly if Ontario County employers are possibly listening to the program.

It would be of great help to understand the purpose and time this order will be active. Civil Procedure professor but it should only be until Discovery for purpose of blocking early disclosure of information. From the Order in your Decision there is no clear detail.

Under the circumstances I am concerned about exaggerated charges and want to keep my record severely clear.

Thank you kindly for your help.
Sincerely for Justice,

Danna M. Mervin